

SIGAL CHATTAH  
United States Attorney  
District of Nevada  
Nevada Bar No. 8264

KARISSA D. NEFF  
Assistant United States Attorney  
Nevada Bar No. 9133  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Karissa.Neff@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Jorge Luis Ramirez Lopez,  
  
Plaintiff

v.

Clyde A. Moore, Field Office Director, for  
Las Vegas Nevada, U.S. Citizenship and  
Immigration Services, in his official capacity  
as well as his successors and assigns, et al.

Defendants

Case No. 2:24-cv-01595-CDS-BNW

**Order Approving Stipulation to  
Extend Federal Defendants' Deadline  
to File Reply in Support of its Cross-  
motion for Summary Judgment**

**(Second Request)**

[ECF No. 30]

Plaintiff, Jorge Luis Ramirez Lopez, through counsel and the United States of  
America on behalf of Federal Defendants ("Federal Defendants"), through undersigned  
counsel, hereby stipulate and agree as follows:

1. On January 28, 2025, the Court entered an order approving the stipulated  
briefing schedule establishing the following deadlines: Plaintiff's motion for summary  
judgment was to be filed by March 7, 2025; Federal Defendants' opposition and combined  
cross-motion for summary judgment was due by April 4, 2025; Plaintiff's reply in support  
of his motion and his opposition to Federal Defendants' cross-motion for summary  
judgment was to be filed by April 25, 2025; and Federal Defendants' reply in support of its  
cross-motion for summary judgment was to be filed on May 9, 2025. (ECF No. 13).

2. Subsequent to that order, the Court granted Federal Defendants three

1 extensions to file their opposition and cross-motion, ultimately extending their deadline  
2 from April 4, 2025, to April 17, 2025. (ECF No. 21).

3 3. Federal Defendants filed their opposition to Plaintiff's motion for summary  
4 judgment and cross-motion for summary judgment on April 17, 2025. (ECF No. 22, 24).

5 4. The parties subsequently entered into a stipulation and order granted by this  
6 Court extending the time for Plaintiff to file their reply in support of their motion for  
7 summary judgment and their response to Federal Defendants' cross-motion for summary  
8 judgment through May 9, 2025. (ECF No. 26).

9 5. Plaintiff filed his reply in support of his motion for summary judgment and  
10 to Federal Defendants' cross-motion for summary judgment on May 9, 2025. (ECF No.  
11 27).

12 6. Per the stipulated briefing schedule, Federal Defendants' reply in support of  
13 its Cross-Motion for Summary Judgment was initially due on May 9, 2025 (ECF No. 13).

14 7. Because the dates were extended in the initial stipulated briefing schedule  
15 such that Plaintiff filed his reply in support of his motion for summary judgment and to  
16 Federal Defendants' cross-motion for summary judgment on May 9, 2025, the parties  
17 requested that the Court extend the deadline for Federal Defendants to file their reply in  
18 support of its counter-motion for summary judgment from May 9, 2025 through May 30,  
19 2025 (ECF No. 28).

20 8. The Court granted the parties first request to extend the deadline for the  
21 Federal Defendants to file their reply in support of its counter-motion for summary  
22 judgment to May 30, 2025 (ECF No. 29).

23 9. The parties now request that the Court extend the deadline for the Federal  
24 Defendants to file their reply in support of its counter-motion for summary judgment from  
25 May 30, 2025 through June 6, 2025, as there is a Federal Holiday and to accommodate  
26 Federal Defendants' counsels' work load as she has ENE evaluation statement due and a  
27 settlement conference in a discrimination case that conflict with the existing deadline.

28 10. Good cause exists for this extension, as it will allow Federal Defendants'

1 counsel time to review Plaintiff's filing to prepare a thorough and complete reply.

2 Accordingly, the parties respectfully request that the Court extend the deadline for  
3 Federal Defendants to file its reply in support of its cross-motion for summary judgment  
4 from May 30th through June 6, 2025. This stipulation is requested in good faith and not for  
5 the purpose of undue delay.

6 Respectfully submitted this 23rd day of May of 2025.

7  
8 SIGAL CHATTAH  
9 United States Attorney

10 /s/ Maria E. Quiroga  
11 MARIA E. QUIROGA, ESQ.  
12 Nevada State Bar No. 13939  
13 7935 W. Sahara Ave., Suite 103  
14 Las Vegas, Nevada 89117

15 *Attorney for Plaintiff*

/s/ Karissa D. Neff  
KARISSA D. NEFF  
Assistant United States Attorney

*Attorneys for the United States*

16 IT IS SO ORDERED:

17   
18 UNITED STATES DISTRICT JUDGE

19 DATED: May 29, 2025  
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